

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD. and MACLAURIN
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN,
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

Adv. Pro. No. 23-50437 (JTD)

**APPENDIX TO MOTION TO DISMISS COMPLAINT BY
DEFENDANTS PATRICK GRUHN, ROBIN MATZKE, AND LOREM IPSUM, UG**

Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum, UG, pursuant to Del. Bankr. L.R. 7007-1(a), submit this appendix in support of (a) *Motion to Dismiss Complaint by Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG* and (b) *Brief in Support of Motion to Dismiss Filed by Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum, UG*:

Tab No.	Item
1.	Stock Purchase Agreement dated October 25, 2020 (SPA 1)
2.	Stock Purchase Agreement dated July 2, 2021 (SPA 2)
3.	Stock Purchase Agreement dated November 14, 2021 (SPA 3)
4.	Amendment to SPA 3, dated November 15, 2021
5.	Motion to Dismiss Bankruptcy Case of FTX Trading, Ltd.
6.	Motion to Dismiss Bankruptcy Case of Maclaurin Investments, Ltd.
7.	Articles of Incorporation of FTX Trading last amended on October 18, 2021, and dated as of January 20, 2022

Tab No.	Item
8.	FTX Trading's General By-law as last amended on March 19, 2019 filed January 16, 2022
9.	Declaration of Craig Jacas with Exhibits
10.	September 15, 2023 letter from FTX Europe AG to Kephas

Respectfully submitted,

Dated: October 27, 2023
Wilmington, Delaware

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
Peter J. Keane (DE Bar No. 5503)
PACHULSKI STANG ZIEHL & JONES LLP
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19801
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
pkeane@pszjlaw.com

THE DALEY LAW FIRM LLC
Darrell Daley (admitted *pro hac vice*)
Samantha Neal (admitted *pro hac vice*)
4845 Pearl East Circle, Suite 101
Boulder, Colorado 80301
Telephone: (303) 479-3500
Email: Darrell@daleylawyers.com
Samantha@daleylawyers.com

- and -

MORRISON COHEN LLP
Joseph T. Moldovan (admitted *pro hac vice*)
Heath D. Rosenblat (admitted *pro hac vice*)
Jason P. Gottlieb (admitted *pro hac vice*)
Michael Mix (admitted *pro hac vice*)
909 Third Avenue, 27th Floor
New York, New York 10022
Telephone: (212) 735-8600
Facsimile: (212) 735-8708
Email: jmoldovan@morrisoncohen.com
hrosenblat@morrisoncohen.com
jgottlieb@morrisoncohen.com
mmix@morrisoncohen.com

Counsel to Lorem Ipsum UG, Patrick Gruhn, and Robin Matzke